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6 NEW ALBERTSONS, INC., a Delaware corporation

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11 Attorney for Plaintiff,

12 CAROLYN BLACKMON

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 CAROLYN BLACKMON, an
individual,

16 Plaintiff,

17 v.

18
19 NEW ALBERTSON'S, INC, a
Delaware Corporation, erroneously
20 named as ALBERTSON'S, LLC, a
foreign limited liability company;
21 ALBERTSON'S HOLDINGS, LLC, a
foreign limited liability company;
22 DOES I through X, and ROE
23 COMPANIES XI through XX,
24 inclusive,

25 Defendants.

CASE NO.: 2:10-cv-00712-KJD-PAL

JOINT STATUS REPORT

26 Pursuant to this Court's Minute Order dated May 17, 2010 (Doc #3),
27 Defendant, NEW ALBERTSONS, INC., by and through its counsel of record, and
28



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1 Plaintiff, CAROLYN BLACKMON, by and through her counsel of record, submit
2 this Joint Status Report.

3
4 **STATUS OF ACTION**

5 1. Plaintiff filed her original Complaint on March 31, 2010. Plaintiff
6 filed her First Amended Complaint on April 26, 2010, prior to serving
7 Defendant with the original Complaint. Accordingly, Plaintiff was not
8 required to file any motions requesting permission to amend her original
9 Complaint.

10 2. New Albertsons, Inc. was mailed a copy of the initial Complaint in
11 this matter on March 31, 2010. New Albertsons, Inc. and its counsel were
12 provided with a copy of Plaintiff's Amended Complaint on April 26, 2010.
13 Defendant has not received formal service of Plaintiff's Amended Complaint;
14 however, Defendant's counsel agreed to accept service on behalf of Defendant,
15 New Albertsons, Inc.

16 3. On May 17, 2010, Defendant, New Albertsons, Inc. filed and served
17 its Notice of Removal pursuant to 28 U.S.C. § 1441. Accordingly, Defendant
18 filed the Notice of Removal within 30 days of service of the Amended
19 Complaint. Also, on May 17, 2010, Defendant, New Albertsons, Inc. filed its
20 Notice of Removal of Action to U.S. District Court with the Eighth Judicial
21 District Court in Clark County, Nevada.

22 4. There are no pending Motions in this matter at either the State District
23 Court Level, or at the Federal District Court Level. Accordingly, the parties
24 have no motions, responses and/or replies to attach to this Joint Status Report,
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1 and the parties do not request any action be taken with regards to any pending
2 motions, as none currently exist.

3 5. The parties participated in a Rule 26(f) conference on July 6, 2010.
4 The Parties have agreed to exchange their initial disclosures by June 30, 2010.
5

6 6. On June 17, 2010, the parties submitted their proposed Stipulated
7 Discovery Plan and Scheduling Order, which is the only matter which will
8 require this Honorable Court's attention.

9 7. The parties will also submit for the Court's approval a Stipulated
10 Confidentiality Agreement and Protective Order, upon which the parties are
11 currently attempting to reach an agreement.
12

13 DATED this 17th day of June, 2010.

14
15 **WILLIAM ERRICO &
ASSOCIATES**

MORAN LAW FIRM, LLC

16
17 /s/ William K. Errico, Esq.
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